

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF AND FACSIMILE

April 19, 2016

The Honorable Frank Maas
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 740
New York, NY 10007-1312

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, write to respectfully request an adjournment of the existing deadline for submission of plaintiffs' motions to compel as to defendants Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO"), currently set for April 29, 2016, to provide additional time for the parties to continue their discussions regarding the relevant discovery disputes and further attempt to narrow the scope of issues to be raised in plaintiffs' motions.

To update the Court, the parties conducted a lengthy in-person meet-and-confer on March 31, 2016 at the offices of Lewis Baach in Washington, D.C. At the conclusion of the meet-and-confer, counsel for the MWL and IIRO agreed to consult with their clients in response to a number of inquiries raised by plaintiffs, and also to undertake good faith efforts to address plaintiffs' outstanding concerns with respect to a number of the categories of documents produced to date. Plaintiffs similarly agreed to provide the defendants with additional information relating to several of the issues raised at the meeting and to undertake good faith efforts to narrow the areas of dispute.

Plaintiffs respectfully submit that an adjournment of the motions' deadline is warranted to allow for continuing dialogue between the parties, the further exchange of information, and to provide adequate time for the parties to work through possible compromises on a range of issues discussed at the meet-and-confer. Plaintiffs remain hopeful that the additional time will lead to the resolution of certain of the disputes. Accordingly, plaintiffs request an adjournment of the

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existing deadline for submission of plaintiffs' motions to compel as to MWL and IIRO until September 30, 2016.

Plaintiffs have conferred with counsel for the MWL and IIRO, and they support plaintiffs' request for an adjournment of the briefing deadline.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,



J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE
COMMITTEES

cc: MDL Counsel of Record (via ECF)

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